

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and on Behalf  
of all others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT  
LANDE,

Defendants.

Civil Action No. 1:17-cv-00916-RA

YING ZHAO, Individually and on Behalf of  
all others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT  
LANDE,

Defendants.

Civil Action No. 1:17-cv-00955-RA

DAVID BLINN, Individually and on Behalf  
of all others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT  
LANDE,

Defendants.

Civil Action No. 1:17-cv-01028-RA

**DECLARATION OF JEFFREY M. NORTON IN SUPPORT OF  
HANY SIKAIK'S MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Jeffrey M. Norton, hereby declare as follows:

1. I am a partner of the law firm of Newman Ferrara LLP (“Newman Ferrara”), counsel for Lead Plaintiff Movant Hany Sikaik (“Sikaik”) and proposed Lead Counsel for the Class. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I submit this declaration, together with the attached exhibits, in support of Mr. Sikaik’s motion for the entry of an Order: (1) consolidating the above-captioned actions *Khoury v. FXCM Inc., et al.*, 1:17-cv-00916-RA, *Zhou v. FXCM Inc., et al.*, 1:17-cv-00955-RA and *Blinn v. FXCM Inc., et al.*, 1:17-cv-01028-RA; (2) appointing him as Lead Plaintiff in the consolidated action (the “Action”) on behalf of a Class of all persons who purchased or otherwise acquired the publicly traded common stock of FXCM Inc., n/k/a Global Brokerage, Inc. (“FXCM” or the “Company”) between March 15, 2012 and February 6, 2017, both dates inclusive (the “Class Period”); and (3) approving Mr. Sikaik’s selection of Newman Ferrara as Lead Counsel for the Class.

3. Attached hereto as the exhibits indicated are true and correct copies of the following:

**Exhibit A:** Notice of Filing of first-filed Action published on Business Wire on February 7, 2016;

**Exhibit B:** Signed Certification of Mr. Sikaik pursuant to the requirements of Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(2), together with a chart reflecting Mr. Sikaik’s Class Period transactions in FXCM’s publicly traded common stock and approximate loss; and

**Exhibit C:** Firm resume of Newman Ferrara.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 10<sup>th</sup> day of April, 2017, at New York, New York.

/s/ Jeffrey M. Norton  
Jeffrey M. Norton